

## REMARKS/ARGUMENTS

In the Office Action, the Examiner has rejected claims 1-57 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0026473 (*Gourraud*) and further in view of U.S. patent Application Publication 2002/0161826 (*Arteaga et al.*). This rejection is respectfully traversed below for at least the following reasons:

It is noted that *Gourraud* states that:

“...a telecommunication system comprises a service node adapted to communicate according to predetermined criteria via an application programming interface with at least one application or via a networking protocol. At least one network entity is adapted to send to the service node a networking protocol trigger that includes an API requirement. The API requirement requests an API response to the trigger. The service node is adapted to respond, depending on the predetermined criteria, to the network entity according to the networking protocol or to communicate with the at least one application via the application programming interface.” (Page 4, paragraph [0042])

However, it is respectfully submitted that *Gourraud* does NOT teach generating or publishing a second interface in accordance with at least one policy for communication between a client and a server node. It should also be noted that the second interface corresponds to a first interface that can be used to communicate with a server node.

Furthermore, it is also noted that *Gourraud* states:

“Although the architecture 300 is shown as employing a single set of APIs 314, it will be understood by those of ordinary skill in the art that internal-service APIs and external-service APIs, such as those described in the co-pending United States Patent Application entitled “COMMUNICATION METHOD AND SYSTEM INCLUDING INTERNAL AND EXTERNAL APPLICATION-PROGRAMMING INTERFACES,” filed concurrently with this application and bearing Attorney Docket No. 27950-484USPT, can be employed in connection with the present invention. When external-service APIs and internal-service APIs are used, the present invention is preferably employed in concert with the internal-service APIs. In the alternative, the present invention can be practiced without the use of internal-service APIs and external-service APIs, but rather with the

single set of APIs 314 that are in some respects analogous to the internal-service APIs.”  
(Page 5, paragraph [0054])

However, it is very respectfully submitted that *Gourraud* does NOT teach a traffic manager that can communicate with both the client and server node. Accordingly, it is respectfully submitted that *Gourraud* cannot possibly teach or suggest a traffic manager that communicates with both a server and a client, wherein the traffic manager generates and publishes a second interface for communication with the client node.

In the Office Action, the Examiner has noted that *Gourraud* does NOT disclose communication via the second interface to allow the client node to access a service in accordance with one policy. Initially, it is respectfully submitted that the serious deficiency of *Gourraud* cannot possibly be cured by another reference. Moreover, it is respectfully submitted that creating a SOAP envelop and sending a request to a remote server does NOT teach communicating with a client node via a second interface generated for a first interface based on at least one policy.

Finally, it is respectfully submitted that the Examiner has not established a prima facie case of obviousness as a motivation or suggestion for combining *Gourraud* and *Arteaga et al.* is lacking. Moreover, neither *Gourraud* nor *Arteaga et al.* teach or even remotely suggest generating or publishing, a second interface for a first interface, based on at least one policy for facilitating communication between two entities (e.g., a server and client).

### **CONCLUSION**

Based on the foregoing, it is submitted that the claims are patentably distinct over the cited art of record. Additional limitations recited in the independent claims or the dependent claims are not further discussed because the limitations discussed above are sufficient to distinguish the claimed invention from the cited art. Accordingly, Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 500388 (Order No. STELP001). Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,  
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